

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS
PRODUCTS LIABILITY LITIGATION

MDL No. 2:18-mn-2873-RMG

This Document relates to:
ALL CASES

**DECLARATION OF MICHAEL A. LONOND IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM
DEFENDANT 3M COMPANY**

I, Michael A. London, hereby declare as follows:

1. I am a member of the law firm Douglas & London and Co-Lead Counsel of the Plaintiffs' Executive Committee. I submit this declaration in support of Plaintiffs' Motion to Compel Discovery from Defendant 3M Company ("3M").

2. Attached hereto as Exhibit A is a true and correct copy of Grandjean, P. *Delayed discovery, dissemination, and decisions on intervention in environmental health: a case study on immunotoxicity of perfluorinated alkylate substances*. ENVIRON HEALTH 17, 62 (2018).

3. Attached hereto as Exhibit B is a true and correct copy of the email correspondence dated Oct. 20, 2021 and Oct. 25, 2021.

4. Attached hereto as Exhibit C is a true and correct copy of a letter from David Hoyle to Daniel L. Ring, dated Dec. 7, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of the document bearing bates number 3M_BELL02796621.

6. Attached hereto as Exhibit E is a true and correct copy of a document bearing document identification number #448.

7. Attached hereto as Exhibit F is a true and correct copy of the document bearing

bates number 3M_BELL00848209.

8. Attached hereto as Exhibit G is a true and correct copy is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00207575.

9. Attached hereto as Exhibit H is a true and correct copy is a true and correct copy of the Olsen Deposition Exhibit LP193.

10. Attached hereto as Exhibit I is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00419718.

11. Attached hereto as Exhibit J is a true and correct copy of the document bearing bates number 3M_BELL00054741.

12. Attached hereto as Exhibit K is a true and correct copy of the document bearing bates number 3MA0025742.

13. Attached hereto as Exhibit L is a true and correct copy of the document bearing bates number 3M_BELL00054589.

14. Attached hereto as Exhibit M is a true and correct copy of the document bearing bates number 3MA00967400.

15. Attached hereto as Exhibit N is a true and correct copy of the document bearing bates number 3M_BELL00054594.

16. Attached hereto as Exhibit O is a true and correct copy of the document bearing bates number 3MA10035579.

17. Attached hereto as Exhibit P is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00080683.

18. Attached hereto as Exhibit Q is a true and correct copy of a document bearing bates number 3M_AFFF_MDL02174949.

19. Attached hereto as Exhibit R is a true and correct copy of the document bearing bates number 3M_AFFF_MDL02342766.

20. Attached hereto as Exhibit S is a true and correct copy of the document bearing bates number 3M_AFFF_MDL02342749.

21. Attached hereto as Exhibit T are true and correct copy of the document bearing bates number 3M_AFFF_MDL00435666.

22. Attached hereto as Exhibit U is a true and correct copy of the document bearing bates number 3M_BELL03185972.

23. Attached hereto as Exhibit V is a true and correct copy of the document bearing bates number 3MA00967775.

24. Attached hereto as Exhibit W is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00647433.

25. Attached hereto as Exhibit X is a true and correct copy of the document bearing bates number 3M_BELL01440050.

26. Attached hereto as Exhibit Y is a true and correct copy of the document bearing bates number 3MA10034826.

27. Attached hereto as Exhibit Z is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00410829.

28. Attached hereto as Exhibit AA is a true and correct copy of the relevant portions of the deposition transcript of 3M Fed. R. Civ. 30(b)(6) witness John Gerber.

29. Attached hereto as Exhibit BB is a true and correct copy of the document bearing bates number 3M_AFFF_MDL00419874.

30. Attached hereto as Exhibit CC is a true and correct copy of the document titled

Organic Fluorine in Human Serum: Natural Versus Industrial Sources. Science, Vol. 212, 26 June 1981.

31. Attached hereto as Exhibit DD is a true and correct copy of the document bearing bates number 3M_BELL01939676.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2022 in New York, New York.

s/ Michael A. London
Michael A. London